

UNITED STATES DISTRICT COURT

United States District Court
Southern District of Texas
FILED

NOV 20 2014

David J. Bradley, Clerk

for the

Southern District of Texas

SEALED

United States of America)

v.)

Case No. M-14-2225-M

MARTINEZ-RAMIREZ, Juan Francisco)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 11/20/2014 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. 1956(a)(1)(B)(i)&(h)

Conspiracy to money launder by knowingly and intentionally attempting to conduct a financial transaction involving the proceeds of a specified unlawful activity.

This criminal complaint is based on these facts:

[See Attachment 1]

☒ Continued on the attached sheet.*Approved for filing
per se 11/20/14*

Complainant's signature

James P. Burke/DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: November 20, 2014 3:38pm

Judge's signature

City and state: McAllen, Texas

Peter E. Ormsby, U.S. Magistrate Judge

Printed name and title

Attachment I

- 1. The Drug Enforcement Administration (DEA) Strike Force Group D81 in McAllen, Texas along with the DEA Houston, Texas Field Division Office has been conducting an investigation into the Juan Francisco MARTINEZ-RAMIREZ Drug Trafficking Organization. MARTINEZ-RAMIREZ is one of the current high ranking leaders of the Gulf Cartel based in the State of Tamaulipas, Mexico and is responsible for the coordination of bulk quantities of narcotics from Mexico into the United States through the Rio Grande Valley, Texas area. In addition, MARTINEZ-RAMIREZ is also responsible for the coordination of smuggling drug related proceeds and firearms from the United States into Mexico. MARTINEZ-RAMIREZ has no legitimate source of income and has used his drug related proceeds to purchase several luxury vehicles and real properties. MARTINEZ-RAMIREZ has assisted in placing the names of members of his drug trafficking organization and others to conceal true ownership of the aforementioned assets.**
- 2. On September 05, 2013, a cooperating defendant was indicted by a federal grand jury in the Eastern District of Texas for Conspiracy with Intent to Distribute Cocaine, Conspiracy with Intent to Distribute Marijuana, and Conspiracy to Launder Monetary Instruments. On September 06, 2013, a federal arrest warrant was issued for the cooperating defendant. Since May of 2014, DEA McAllen, Texas Strike Force Group D81 Agents have seized multi-ton quantities of marijuana and multi-kilogram quantities of cocaine belonging to the cooperating defendant's Drug Trafficking Organization.**
- 3. On October 09, 2014 DEA McAllen, Texas Group D81 Agents arrested cooperating defendant in Pharr, Texas subsequent to a traffic stop conducted by Edinburg Police Department Officers on a vehicle occupied by cooperating defendant.**
- 4. On October 10, 2014, DEA McAllen, Texas Group D81 Agents obtained and executed a federal search warrant at a residence identified as 412 S. Moorefield Road in Mission, Texas and owned by to cooperating defendant. As a result of the search warrant, agents seized \$42,700.00 in U.S. currency believed to be drug related proceeds.**
- 5. On October 17, 2014, DEA Special Agent Antonio De La Cruz, DEA Task Force Officers Jorge E. Alvarez, and Ralph Garcia interviewed Minerva Alejandra VEGA, listed owner of the aforementioned residence according to Hidalgo County Appraisal District documents. VEGA stated that on October the 1st or the 2nd of 2014, VEGA sold the residence for \$110,000.00. VEGA stated that she was paid the \$110,000.00 in U.S. currency. VEGA stated she was instructed to file the General Warranty Deed with the Hidalgo County Clerk's Office indicating Zobeida Lomeli GARCIA as the grantee. Through the investigation, agents learned that the cooperating defendant's Drug Trafficking Organization instructed VEGA to list GARCIA as the grantee for the residence.**

6. On October 30, 2014, DEA Special Agents Antonio De La Cruz and Lucy Carter interviewed the cooperating defendant, owner of the aforementioned residence. The cooperating defendant stated that he purchased the aforementioned residence and provided his close associate and also Gulf Cartel member Juan Francisco MARTINEZ-RAMIREZ aka "PACO 77" with \$150,000.00 in U.S. currency of drug proceeds for the purchase of the residence. MARTINEZ-RAMIREZ told the cooperating defendant that he would place the residence under a different name in order to disguise the cooperating defendant's ownership. The cooperating defendant stated that he utilized drug related proceeds to purchase the residence. The cooperating defendant stated that he was aware that the residence was going to be placed under a different name to conceal true ownership. After the residence was purchased, MARTINEZ-RAMIREZ called the cooperating defendant and advised him that the residence had only cost \$110,000.00 in U.S. currency. The cooperating defendant advised MARTINEZ-RAMIREZ to keep the money that was left over.
7. On November 04, 2014, DEA Special Agent Antonio De La Cruz and DEA Task Force Officer Jorge E. Alvarez interviewed Zobeida Lomeli GARCIA, listed owner of the aforementioned residence according to General Warranty Deed under document number: 2554852. GARCIA stated that a friend named Maria Gonzalez, asked if GARCIA was willing to open a utilities and light account with the City of Mission. GARCIA stated that Gonzalez said that the residence was identified as 412 S. Moorefield Road in Mission, Texas. GARCIA stated that Gonzalez told her that the subjects who purchased the aforementioned residence were illegal and did not have any legal documents to be in the United States. GARCIA stated that she agreed to open the accounts under her name for the residence as a favor to Gonzalez. GARCIA stated that she received no compensation and was given only \$110.00 in U.S. currency to open the account, which was the required deposit amount. GARCIA stated that she was unaware there was a General Warranty Deed for the residence indicating GARCIA was the owner. GARCIA stated that the residence did not belong to her and had no interest in the residence.
8. General Warranty Deed under Hidalgo County Clerk's Office document number: 2554852 indicates that real property with an address of 412 S. Moorefield Road Mission, Texas and legal description as follows: Lot Two Hundred Sixty-three (263), Del Oro Unit II, an addition to the City of Mission, Hidalgo County, Texas, according to the map or plat thereof recorded in Volume 47, Page 58, Map Records, Hidalgo County, Texas, reference to which is here made for all purposes, was purchased by Zobeida Lomeli GARCIA.
9. Based on all the aforementioned facts, my training and experience, the conduct of the cooperating defendant and Juan Francisco MARTINEZ-RAMIREZ aka "PACO 77" are common narcotics trafficking and money laundering characteristics. It is common for narcotics traffickers to place valuable assets under assumed/nominee names to hide illegal proceeds and properties to deter law enforcement from seizing their assets derived from illegal narcotics trafficking.